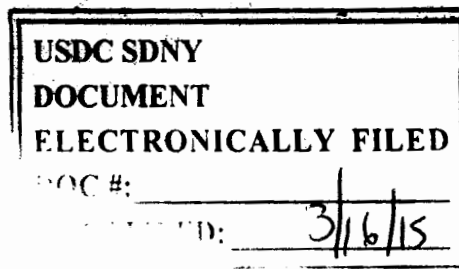


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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SECURED WORLDWIDE, LLC,	:	No. 15 Civ. 1761 (CM)
	:	
Plaintiff,	:	
-versus-	:	ORDER TO SHOW CAUSE FOR
	:	PRELIMINARY INJUNCTION AND
CORMAC KINNEY,	:	<u>TEMPORARY RESTRAINING ORDER</u>
	:	
Defendant.	:	
-----	X	

Upon the annexed declaration of A. Joseph Lipton, executed on the 10th day of March, 2015, and of Max Moskowitz, executed on the 6th day of March, 2015, each together with the exhibits thereto, it is hereby

ORDERED that defendant Cormac Kinney show cause before this Court, in room 19 of the Courthouse, 500 Pearl Street, New York. NY 10007, on the 23rd day of March, 2015, at 9:30 AM o'clock or as soon thereafter as counsel can be heard, why an

order should not be entered, pursuant to Fed. R. Civ. P. 65, preliminarily enjoining Kinney and all those acting together or in concert with him, from:

(i) divulging or using any confidential information of any type that he acquired as a result of his employment with or participation as a member, manager, or other agent of Secured Worldwide;

(ii) using Secured Worldwide's intellectual property, including but not limited to the patent SECURE DIAMOND SMART CARDS AND EXCHANGE SYSTEMS THEREFOR, an application for which is pending, and the "Vault" trademarks, registration of which is pending, or any variation of them, including through use and operation of websites containing those trademarks in the domain name;

(iii) attempting to exercise any control over the domains www.vault.com, www.vault.net, and www.securedworldwide.com, and any other domains containing the terms "vault" or "securedworldwide" or to deprive Secured Worldwide the exclusive control over those domains;

(iv) participating in any business to the extent such participation involves either self-contained, security enabled instruments or packaging housing diamonds or diamond products ("Secured Products") or an online purchasing and sales portal for the purchase or sale of Secured Products, with or without price quotation services, liquidity assurance services or Secured Product information verification services; and

(v) disparaging Secured Worldwide or its business; and, sufficient cause appearing therefor, it is further

ORDERED that, pending the hearing of the motion, Kinney and all those acting together or in concert with him are restrained from the foregoing; and it is further

(1) any of
(2) ordered to return to Plaintiff
and to remove himself from the control on the domain name registration and replace his name with Plaintiff's name

ORDERED that service of a copy of this order to show cause, together with the papers upon which it was entered, on Kinney by hand delivery to his home address, 845 United Nations Plaza, New York, New York 10017, with a copy by overnight mail to his attorneys, Leason Ellis LLP, One Barker Avenue, White Plains, NY 10601, sent not later than the ___ day of March, 2015, shall be deemed good and sufficient; and it is further

SERVICE EFFECTED

ORDERED that answering papers, if any, shall be served on plaintiff's counsel so as to reach their offices not later than 4 p.m. two days preceding the return date of the motion.

DISCUSSION SHALL BE TAKEN AND PAPERS FILED IN ACCORDANCE WITH THE SCHEDULE SET IN THE MANUSCRIPT OF PROCEEDINGS

Dated: New York, NY
March 16, 2015



U.S.D.J.